

EXHIBIT B

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Eric Perrott, Esq.
Gerben Law Firm PLLC
1050 Connecticut Ave NW, Suite 500
Washington, DC 20036
Telephone: (202) 780-9191
Facsimile: (202)
eperrott@gerbenlawfirm.com

Attorney for Petitioner
Gerben Law Firm, PLLC

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

In Re DMCA Subpoena to Vilmi Henri
Kalle Johannes CORPORATION and
Internet Domain Service BS Corp.

Case No.:

**Petitioner's Request to the Clerk of
Courts Pursuant to 17 U.S.C.
512(h) for Issuance of Subpoena to
Vilmi Henri Kalle Johannes
CORPORATION and Internet
Domain Service BS Corp to Identify
Alleged Infringers**

DECLARATION OF JOSHUA M. GERBEN, ESQ.

I, Josh Gerben, principle of Gerben Law Firm, PLLC, the Petitioner in the above-captioned matter, hereby declare as follows:

1. I am the principle of Gerben Law Firm, PLLC.
2. I submit this declaration in support of the Petitioner's Request to the Clerk of Courts Pursuant to 17 U.S.C. 512(h) for Issuance of Subpoenas to Vilmi Henri Kalle Johannes CORPORATION (also known as OrangeWebsite.Com) ("OrangeWebsite.com") and Internet Domain Service BS Corp. (also known as InternetBS) ("InternetBS") to Identify Alleged Infringers (the "Subpoenas") to identify the owner(s) and operator(s) of gerbentrademark.com, a

1 website that has copied my firm's copyrighted works that are the subject of take down
2 notifications pursuant to 17 U.S.C. § 512(c)(3)(A) to OrangeWebsite.com and InternetBS
3 attached as Exhibit A to this Declaration.

4
5 3. I have a good-faith belief that the Petitioners' rights under the U.S. Copyright
6 Law has been infringed by the owner(s) and/or operator(s) of www.gerbentrademark.com.

7 4. The purpose for which the Subpoenas at issue are being requested is for the sole
8 purpose of obtaining the identified of the alleged infringer(s) and such information will only be
9 used for the purpose of protecting Petitioner's rights under the U.S. Copyright Act.

10 I declare, under penalty of perjury under the laws of Virginia and the United States of
11 America that the forgoing is true and correct.
12

13
14 Executed on May 18, 2018, in Lancaster, PA.

15
16 Respectfully submitted,

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18 
19

20 Joshua M. Gerben, Esq.
21 jgerben@gerbenlawfirm.com
22 Principle
23 Gerben Law Firm PLLC
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EXHIBIT A

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1050 CONNECTICUT AVE NW, SUITE 500 | WASHINGTON, DC 20036 | 202.294.2287

**FOR SETTLEMENT PURPOSES ONLY
SUBJECT TO FEDERAL RULE OF EVIDENCE 408**

May 10, 2018

Vilmi Henri Kalle Johannes CORPORATION
Orangewebsite.com
Klapparstígur 7
101 Reykjavík, Iceland
abuse@orangewebsite.com.

VIA ELECTRONIC MAIL

Re: DMCA Take-Down Notice

Dear OrangeWebsite.com,

I am the principal of Gerben Law Firm, PLLC, a trademark law firm located in Washington, D.C. Gerben Law Firm owns the registered copyrights in all of the content on its website, www.gerbenlaw.com. Gerben Law Firm is also the owner of the registered copyright registration, TX0008369286 for the content on its website.

It has come to our attention that one of your customers is hosting unauthorized copies of Gerben Law Firm's copyrighted works on the domain name, www.gerbentrademark.com (proof attached as Exhibit A.) The material being hosted by the owner of www.gerbentrademark.com infringes on Gerben Law Firm's copyrighted works.

Gerben Law Firm may be contacted at:

Joshua M. Gerben, Esq.
jgerben@gerbenlawfirm.com
1050 Connecticut Ave NW, Suite 500
Washington, DC 20036
(202) 294-2287

I have a good faith belief that use of the material in the manner complained of, is not authorized by the copyright owner, its agent, or the law. The information in the notification is accurate, and under penalty of perjury, I am authorized to act on behalf of Gerben Law Firm, PLLC, the owner of an exclusive right that is allegedly infringed.

FRE 408 Communication
Re: DMCA Take-Down Notice
May 10, 2018

Nothing contained in this letter, nor any act or omission by Gerben Law Firm LLC's staff is intended or should be deemed to be a waiver, abridgment, alteration, modification or reduction of any rights or remedies which Gerben Law Firm may have regarding this matter, and all rights and remedies, whether at law or in equity, are hereby expressly reserved.

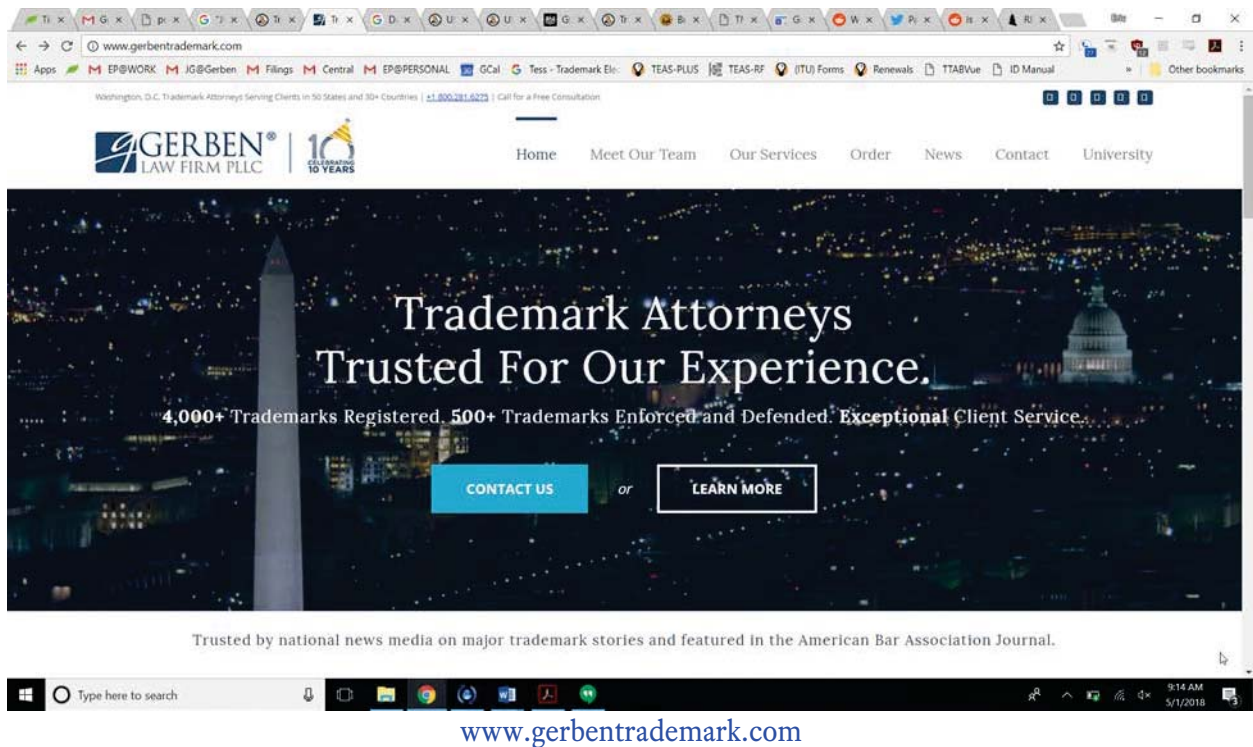
Kind Regards,

A handwritten signature in black ink, appearing to read 'J. Gerben', with a stylized flourish at the end.

Joshua M. Gerben, Esq.
Gerben Law Firm, PLLC
1050 Connecticut Ave NW
Suite 500
Washington, D.C. 20036

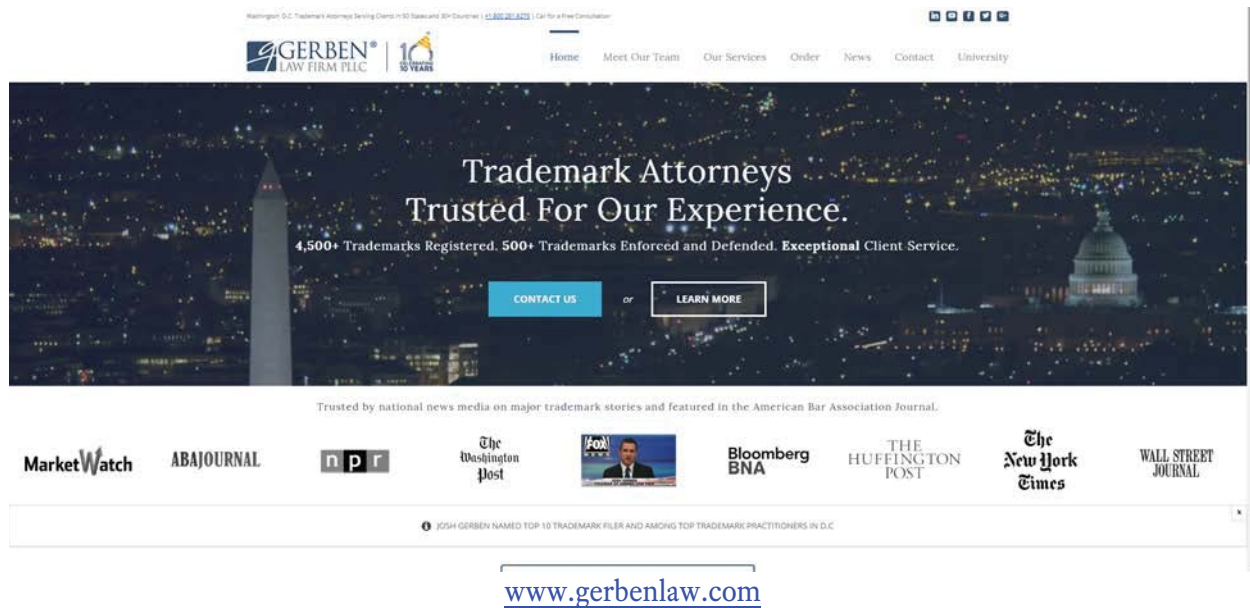
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May 10, 2018

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www.gerbentrademark.com

FRE 408 Communication
Re: DMCA Take-Down Notice
May 10, 2018





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**FOR SETTLEMENT PURPOSES ONLY
SUBJECT TO FEDERAL RULE OF EVIDENCE 408**

May 10, 2018

Internet Domain Service BS Corp.
Ocean Centre, Montagu Foreshore
East Bay Street
Nassau, The Bahamas
P.O. Box SS-19084

VIA ELECTRONIC MAIL

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Washington, DC 20036
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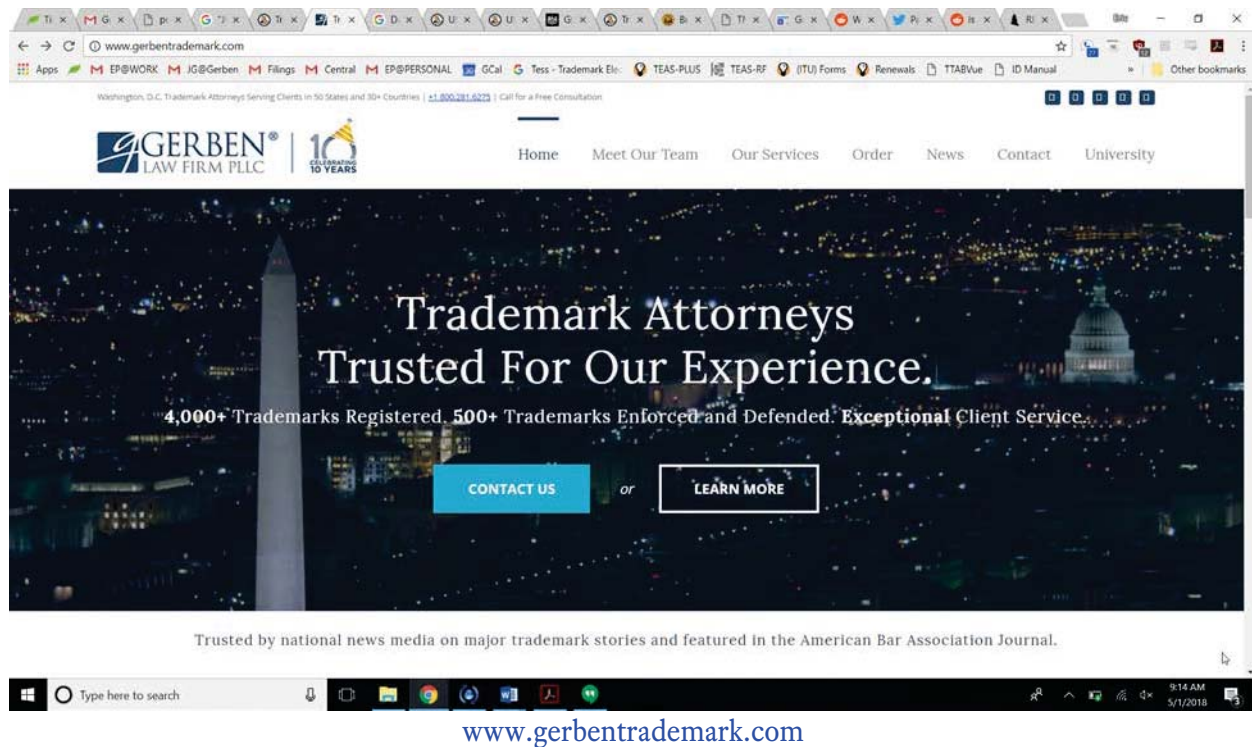
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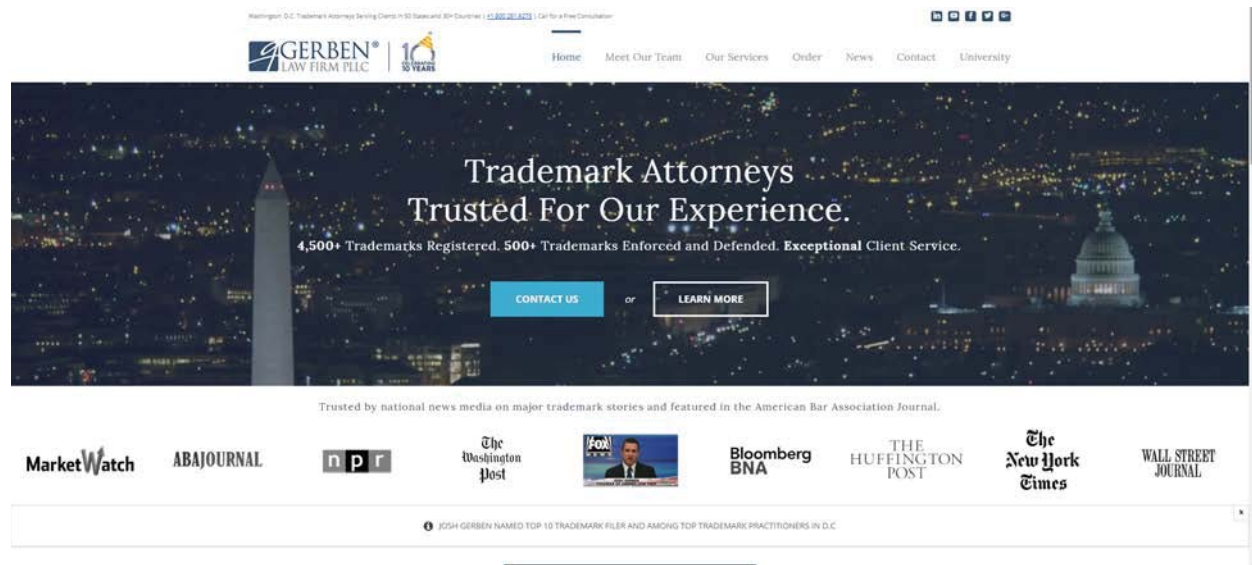
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FRE 408 Communication
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